

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

IN RE: KRISTIN CLANCEY Debtor	Case No. 19-12486-elf
Freedom Mortgage Corporation, Movant	Chapter 13
vs. KRISTIN CLANCEY and Michael Clancey, Rosemarie Cimino, (NON- FILING CO-DEBTORS) Respondents	11 U.S.C. §362 and §1301

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Freedom Mortgage Corporation (hereinafter “Movant”) has filed a Motion for Relief from the Automatic Stay and Co-Debtor Stay with the Court.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the Court to grant relief sought in the motion or if you want the Court to consider your views on the motion, then on or before October 4, 2022 you or your attorney must do all of the following:

(a) file an answer explaining your position at:

Clerk's Office, U.S. Bankruptcy Court  
Eastern District of Pennsylvania  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

Brock and Scott, PLLC

8757 Red Oak Boulevard, Suite 150  
Charlotte, NC 28217

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on October 11, 2022 at 9:30 AM, in Courtroom #1, United States Bankruptcy Court, Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorneys named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office in Philadelphia at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

September 16, 2022